

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION

In re:

Chapter 13

Linda Elaine Palmer (xxx-xx-1979)

Case No. 18-24901

Debtor.

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MOTION TO MODIFY PLAN

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Debtor moves this Court to modify the plan upon the grounds that since the plan was confirmed the circumstances of Debtor have materially changed.

WHEREFORE, it is prayed

1. to advance the ongoing mortgage payment to BSI Financial Services (hereinafter called mortgagee) by 9 mortgage payments,
2. that said mortgage holder be directed to file an amended arrearage claim to include these additional mortgage payments,
3. to pay all arrearages over the remaining term of the plan,
4. that the trustee be directed to enter an order adjusting the plan payments to properly fund the plan over the remaining term, and
5. for such other relief to which debtor may be entitled.

/s/ Philip F. Counce

PHILIP F. COUNCE, Attorney for Debtor  
3333 Poplar Ave., Memphis, TN 38111  
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing MOTION TO MODIFY PLAN and NOTICE OF ELECTRONIC FILING of same was mail, faxed or served electronically to the entities listed below under "PARTIES TO SERVE" on the September 22, 2020.

/s/ Philip F. Counce

PHILIP F. COUNCE, Attorney at Law

PARTIES TO SERVE:

Debtor

Debtor's attorney

Case trustee

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